

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
(COLUMBIA DIVISION)**

*In re SCANA Corporation Securities Litigation*

Civil Action No. 3:17-CV-2616-MBS

CLASS ACTION

**JOINT MOTION FOR ENTRY OF [PROPOSED] ORDER RE: AGREED  
PROTOCOL GOVERNING DISCOVERY MATTERS AND  
THE PRODUCTION OF ELECTRONICALLY STORED INFORMATION (“ESI”)**

The parties have conferred and reached an agreement as to the production of Electronically Stored Information (“ESI”) and other discovery matters. The parties, therefore, respectfully request that the Court grant the proposed Order Re: Agreed Protocol Governing Discovery Matters and the Production of ESI, attached as Exhibit A.

Respectfully submitted this 29th day of July, 2019.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 29, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Marlon E. Kimpson

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